

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

ATLANTIC COAST PRODUCE, INC., et al :
:
Plaintiffs :
:
v. : Case No. 1:06-cv-733-MJG
:
PARADISE PRODUCE CO., INC., et al :
:
Defendants :
:

REQUEST OF PLAINTIFF FOR ISSUANCE OF WRIT OF GARNISHMENT

MADAM CLERK:

A Consent Judgment, Stipulation and Order was entered in favor of Plaintiffs on March 24, 2006 (Docket No. 8), and Default Judgment was entered in favor of Intervening Plaintiffs on September 5, 2007, *nunc pro tunc*, via the Order Closing Case. (Docket No. 37.) No supersedeas bond has been posted nor is there in effect at this time any stay of execution of or proceedings to enforce the Judgment.

Please issue a Writ of Garnishment of Wages to Other Side Produce, LLC, 405 Carter Avenue, Denton, MD 21629.

The amount presently due and owing Plaintiffs and Intervening Plaintiffs is \$212,729.15, which includes prejudgment interest and attorneys' fees.

Judgment Debtor:

John W. Allen
4408 Rabbit Run Road
Bridgeville, DE 19933-3418

Garnishee:

Other Side Produce, LLC
405 Carter Avenue
Denton, MD 21629

Dated: July 22, 2013

McCARRON & DIESSE

By:/s/ Blake A. Surbey

Blake A. Surbey (ID # 29870)
4530 Wisconsin Ave., NW, Suite 301
Washington, D.C. 20016
(202) 364-0400
(202) 364-2731 fax
bsurbey@mccarronlaw.com
Counsel for Plaintiffs and Intervening Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

ATLANTIC COAST PRODUCE, INC., et al	:	
	:	
Plaintiffs	:	
	:	
v.	:	Case No. 1:06-cv-733-MJG
	:	
PARADISE PRODUCE CO., INC., et al	:	
	:	
Defendants	:	

WRIT OF GARNISHMENT OF WAGES

**WRIT ISSUED AS TO
JUDGMENT DEBTOR:**

John W. Allen
4408 Rabbit Run Road
Bridgeville, DE 19933-3418

**NOTICE TO JUDGMENT DEBTOR
AND GARNISHEE:**

Amount of Judgment Owed:
\$212,729.15

Federal and State Exemptions may be
Available to you -- see below.

TO GARNISHEE: Other Side Produce, LLC
ADDRESS: 405 Carter Avenue, Denton, MD 21629

You are hereby directed to hold the wages of the judgment debtor named above subject to further proceedings in this Court. **YOU MUST FILE A WRITTEN ANSWER**, in the Office of the Clerk, U.S. District Court, Room 409, U.S. Courthouse, 101 W. Lombard Street, Baltimore, Maryland 21201, within 30 days after service of this Writ on you and serve said Answer on the attorneys for Plaintiffs, Blake A. Surbey, Esq.; McCarron & Diess; 4530 Wisconsin Avenue, NW; Suite 301; Washington DC 20016. Failure to do so may result in judgment by default being entered against you, the garnishee.

(**NOTE:** The answer shall state whether the debtor is an employee of the garnishee and, if so, the rate of pay and the existence of prior liens. The garnishee may assert any defense that the garnishee may have to the garnishment, as well as any defense that the debtor could assert.)

TO THE JUDGMENT DEBTOR:

You are hereby notified that you may file in the Office of the Clerk of this Court, within 30 days after service of the Writ of Garnishment on the garnishee, any defense or objection you may have. . Some federal benefit payments may be automatically protected from garnishment and will not be held in response to the writ of garnishment. In addition, you have the right under Maryland or Federal law to claim an exemption of certain property or money including: (1) A portion of earnings (Wage Income); (2) Welfare payments; (3) Social Security Disability Benefits and Supplemental Security Income Benefits; (4) Retirement Income (Public/Private); (5) Alimony and Child Support; (6) Unemployment and Workmen's Compensation; (7) Disability and Health Insurance payments; (8) Annuities; (9) Life Insurance; (10) Household Goods, Work Tools, etc. All motions must be filed in the Office of the Clerk, U.S. District Court, Room 409, U.S. Courthouse, 101 W. Lombard Street, Baltimore, Maryland 21201, and must state the basis upon which the relief is sought. The motion should also be served on counsel for Plaintiff, Blake A. Surbey, Esq.; McCarron & Diess; 4530 Wisconsin Avenue, NW; Suite 301; Washington DC 20016. If a hearing is desired, it should be requested in the motion.

WITNESS the Honorable Chief Judge of the United States District Court for the District of Maryland.

Date Issued: _____

CLERK

DEPUTY CLERK

ADDRESS OF JUDGMENT DEBTOR:

John W. Allen
4408 Rabbit Run Road
Bridgeville, DE 19933-3418